

SUPPORTING STATEMENT

Contacts Concerning Project Speak Out (Practitioner Fraud Pilot Program)

Form G-1046

(OMB No. 1615-0074)

A. Justification.

1. Project Speak Out is a pilot program designed to assist undocumented aliens – a hard to reach population – who have been defrauded by unscrupulous immigration practitioners, such as notarios. Approximately five community-based organizations (CBOs) will receive complaints of fraudulent practitioners from undocumented aliens and forward the complaints to USCIS. However, not all persons contacting the CBOs will file complaints. Therefore, it is important to collect information on the number of individuals inquiring about the program and requesting to participate in the program to evaluate the success of the pilot. Thus, this form will be used as a tallying sheet to count the number of individuals in certain eligibility categories that contact the organizations, as well as the country of birth and/or ethnicity of those individuals.

This form will be used in evaluating the Project Speak Out pilot program to ensure that all persons eligible to benefit from this program are being included and receiving the appropriate assistance. The form will help the agency to determine the number of persons served by the program and various characteristics of those persons including their country

of birth and whether they are eligible for the program. By collecting this information, the agency also will be able to estimate the number of persons who are victims or claiming to be victims of immigration practitioner fraud.

2. The form will be completed by community-based organizations assisting the agency as complaint intake organizations. The form will be submitted to the agency Research and Evaluation Division on a monthly basis, for monthly tracking purposes. The form provides a standardized way of recording the number of individuals contacting the CBOs concerning the pilot program. The agency will use the information collected on the form to determine how many persons are served by the program and if its public outreach efforts are successful.
3. The use of this form provides the most efficient means for collecting and processing the required data. In this case the agency does not employ the use of information technology in collecting and processing information. Currently, the agency does not have the automated capability in place to accept electronic submission of this form. CBOs may submit the information in a variety of ways, including by mail, fax or e-mail.
4. Because this is a pilot program involving a population that is both unique (program participants) and hard-to-reach (undocumented aliens), the information collected on this form is not elsewhere available; therefore, this data collection will not result in a duplication of effort.

5. This collection of information does not have an impact on small businesses or other small entities. Approximately five CBOs will participate in the pilot program. Such organizations have expressed interest in provided voluntary assistance to USCIS for this pilot.
6. If this information is not collected, the agency will not be able to evaluate the effectiveness of this program and its potential use in other situations, and will not be able to measure the extent of practitioner fraud in the immigrant community, which will hinder federal and local law enforcement agencies' ability to apprehend and prosecute perpetrators of fraud.
7. Because this information collection is part of an evaluation of a 12-month pilot program, the respondents will be required to submit information on a monthly basis. By reviewing results in an on-going fashion, the agency will be able to make adjustments to the program throughout the 12-month pilot period in order to ensure that as many eligible individuals are reached and invited to participate. The target audience for program participation is a hard to reach population, therefore the agency will continually monitor the pilot to determine if public information and outreach efforts are successful or need to be revised during the pilot period.
8. The Research and Evaluation Division has consulted with interested CBOs and agency offices to obtain their views on the data elements to be collected, the frequency of collection, and the manner of collection of data for the pilot program. Their recommendations have been incorporated into this form.

Public comments cannot be addressed in the initial submission. Any public comments will be reconciled and addressed in the justification package with the agency's second submission.

9. The agency does not provide payment or gifts to respondents in exchange for a benefit sought.

10. There is no assurance of confidentiality. However, no identifying information, other than country of birth or ethnicity is recorded on the form. Individuals' names and other identifiers will not be collected on this form.

11. There are no questions of a sensitive nature.

12.	<u>Annual Reporting Burden:</u>	Completing Form	Submitting Form
a.	Number of CBOs	5	5
b.	Frequency of Reporting	12	12
c.	Number of Responses per CBO	100	*10
d.	Total Annual Responses	6,000	600
e.	Hours per Response	.700	.166
f.	Total Annual Reporting Burden	4,200	100

The projected hours per response for this collection were derived by breaking down the

process into two components:

Completion of the Form	42 Minutes
Mailing/faxing/e-mailing the Form	10 Minutes
TOTAL Hours per Response	52 Minutes (.866 hours)

Annual Reporting Burden

Total annual reporting burden hours is 4,300. This estimate for completing the form was derived by multiplying the number of CBOs/respondents (5) x the frequency of response (12 months) x number of complaints lodged per CBO (100) x 42 minutes (.700 hours) per response equals **4,200**. This estimate also includes the number of CBO's (5) x the frequency of reporting (12 months) x 10 minutes (.166) x the number of responses per CBO (*10) equals **100**.

* Each reporting form allows the CBO to list 10 respondents. Accordingly, it is estimated that the CBO will have 100 respondents per month divided by 10 respondents per reporting form, equaling 10 submissions per month.

13. There are no capital or start-up costs associated with this information collection. Any cost burdens to respondents as a result of this information collection are identified in Item 14. Additionally, there is no fee charge for the collection of this information.

14. Annualized Cost Analysis:

a. Printing Cost	\$ 450
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b.	Collection and Processing Cost	\$ 240,000
c.	Total Cost to Program	\$ 240,450
d.	Fee Charge	0
e.	Total Cost to Government	\$ 240,450

Government Cost

The estimated cost to the Government is \$ 240,450. This figure is calculated by using the estimated number of responses (6,000) x 1 hour (agency time required to collect and process information) x \$40 (suggested average hourly rate for clerical, officer, and supervisory time with benefits). In addition, this figure includes the estimated overhead cost for printing, stocking, and distributing the form which is \$450.

Public Cost

The estimated annual public cost is \$43,000. This estimate is based on the number of respondents (5) x the frequency of response (12) x the number of responses (100) x 42 minutes (.700 hours) per response x \$10 (Average hourly rate). This estimate is also based on the number of CBO's (5) x the frequency of reporting (12 months) x 10 minutes (.166) x the number of responses per CBO (10) x \$10 (Average hourly rate).

15. There has been a decrease of **47,660** burden hours previously reported for this information collection.
16. The agency does not intend to employ the use of statistics or the publication thereof for this information collection.

17. The agency is not seeking a waiver to display the expiration date.
18. The agency does not request an exception to the certification of this information collection.

See attached Item 19 of Form OMB 83-I.

B. Collection of Information Employing Statistical Methods.

Not Applicable.

C. Certification and Signature.

PAPERWORK CERTIFICATION

In submitting this request for OMB approval, I certify that the requirements of the Privacy Act and OMB directives have been complied with including paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under 5 CFR 1320.

Richard A. Sloan,

Director,

Regulatory Management Division,

U.S. Citizenship and Immigration Services.

Date